

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	4:22 CR 3077
)	
vs.)	
)	
NEIL SURESH CHANDRAN,)	
)	
Defendant)	
)	

MOTION FOR PROTECTIVE ORDER

Pursuant to Federal Rule of Criminal Procedure 16(d) and 18 U.S.C. § 3771(a), the United States of America, by and through the undersigned, moves for the entry of a protective order regarding the dissemination of discovery and offense materials, and in support thereof states as follows:

Defendant has been charged with wire fraud and engaging in monetary transactions in property derived from specified unlawful activity. In accordance with this Court's Discovery Order and pursuant with Federal Rule of Criminal Procedure 16, the Government intends to produce discovery material to Defendant's counsel. This discovery will include sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties. In order to protect the aforementioned interests, the Government requests that the Court enter an order of protection regarding the dissemination of the discovery.

The Court's authority to issue such an order is well established. Specifically, Rule 16(d)(1) permits courts to enter protective orders that deny, restrict, or defer discovery or inspection, or grant other appropriate relief for good cause. Rule 49.1(e) provides authority to issue protective

orders concerning matters of privacy and personal information. *Id.* Indeed, “[a] trial court can and should, where appropriate, place a defendant and his counsel under enforceable orders against unwarranted disclosure of the materials which they may be entitled to inspect.” *Alderman v. United States*, 394 U.S. 165, 185 (1969).

Accordingly, the Government requests this Court limit the disclosure of these documents, as specified in the proposed protective order.

The undersigned has reached out to counsel for Defendant, who oppose the Government’s motion and entry of a protective order.

WHEREFORE the United States respectfully requests that the Court enter a protective order regarding the discovery materials in this case.

Respectfully Submitted,

LORINDA I. LARYEA
ACTING CHIEF
U.S. DEPARTMENT OF JUSTICE
CRIMINAL DIVISION, FRAUD SECTION

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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2022, I electronically filed the foregoing with the Clerk of the Court of the United States District Court for the District of Nebraska by using the CM/ECF system.

/s/ Tian Huang
TIAN HUANG